

# Exhibit J

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CAITRIONA BRADY : CIVIL ACTION  
v. :  
THE MIDDLE EAST FORUM : NO. 19-5082  
: :  
: :

**ORDER**

AND NOW, this 12<sup>th</sup> day of June 2020, upon considering the Defendant's Motion to compel (ECF Doc. No. 45), Plaintiff's Motion to compel (ECF Doc. No. 51), lacking timely responses consistent with our Policies, and for good cause, it is **ORDERED**:

1. Defendant's Motion to compel (ECF Doc. No. 45) is **GRANTED in part** and, to the extent not already completed consistent with counsels' obligations to resolve these issues under the Federal Rules:
  - a. Plaintiff shall, on or before **June 16, 2020**, produce her signed verification to the pending interrogatories, written responses to requests for production of documents without objection other than a stated specific privilege objection, respond to Defendant's second request for admission, produce all responsive documents including emails, documents from her Google Drive account, communications from her iPhone and iCloud account, WhatsApp account, Telegram, and a fulsome and specific privilege log of all responsive information withheld based upon a defined privilege; and,
  - b. Appear either in person or by video to complete her deposition for no longer than five more hours on or before **June 19, 2020**, unless otherwise agreed by counsel;
2. Plaintiff's Motion to compel (ECF Doc. No. 51) is **GRANTED in part** and to the extent not already completed consistent with counsels' obligations to resolve these issues under the Federal Rules counsel has not already resolved these issues:

a. Defendant shall produce Greg Roman, Daniel Pipes, Steven Levy, Matthew Bennett, Laurence Hollin, and Mark Fink for depositions as originally scheduled on or before **June 19, 2020**, unless otherwise agreed by counsel; and,

b. Defendant shall produce all responsive documents not produced to date, including those which it believes it may have some confidentiality or other protection, subject to an agreement by counsel to, at a minimum and subject to counsel's further agreement, use those identified documents solely and entirely for the purpose of this litigation alone and not to be distributed or shown to third persons without the written email consent of the Defendant's counsel, and with this Court strictly enforcing a private agreement while reminding counsel of our obligations to ensure public access for documents filed in Court.

  
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KEARNEY, J.